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October 12, 2022

BY ECF:

Honorable Lewis A. Kaplan
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Hassab El Nabi v. City of New York et al.,
Dkt. No. 21-cv-03768 (LAK)(JW)

Dear Hon. Judge Kaplan,

We represent Plaintiff in the above-titled action and write jointly with counsel for Defendants, Brian Francolla, Esq., to provide the Court with a status update pursuant to the Court's Orders dated August 23, 2022 and September 30, 2022. The parties appeared for a settlement conference before the Honorable Jennifer E. Willis, United States Magistrate Judge, on October 11, 2022. While strides were made, Judge Willis recommended a second session to continue negotiations. As such, the parties are scheduled to appear for a second settlement conference on November 01, 2022 at 10:00am. Accordingly, we respectfully request that the limited stay of discovery remain in place pending our participation in the second mediation conference. Should the Court grant this request, the parties propose filing a status update by November 04, 2022 advising the Court as to whether settlement discussions were successful, or, in the event we are unable to reach an agreement, with an updated schedule for the completion of discovery.

We thank Your Honor for your time and attention to this matter.

Respectfully submitted,

/s/

Tahanie A. Aboushi, Esq.
Remy Green, Esq.
Elena L. Cohen, Esq.
Attorneys for Plaintiff

cc: all counsel of record